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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RSA PROTECTIVE TECHNOLOGIES, LLC,

Plaintiff,

v.

THE PORT AUTHORITY OF NEW YORK  
AND NEW JERSEY; THORNTON  
TOMASETTI, INC.; SKANSKA USA, INC.;  
AECOM,

Defendants.

CASE NO.: 18-cv-09960-JGK

**MOTION TO FILE UNDER SEAL  
AND [PROPOSED] ORDER**

**RSA PROTECTIVE TECHNOLOGIES' MOTION TO FILE UNDER SEAL EXHIBITS  
B AND C TO THE THIRD AMENDED COMPLAINT AND [PROPOSED] ORDER**

Defendant RSA Protective Technologies, LLC (“RSA” or “Plaintiff”) hereby moves this Court, pursuant to Fed. R. Civ. P. 26(c) and Section 6 of the Electronic Case Filing Rules, for an order to file under seal Exhibits B and C to the Third Amended Complaint.

Exhibits B and C to Plaintiff’s Third Amended Complaint contain examples of the accused devices in the above captioned litigation. The original versions of these documents were produced by the Port Authority Defendant (“Port Authority”) to RSA under strict confidentiality provisions, due largely to public safety concerns. RSA and the other defendants in this case had to be cleared by the Secure Worker Access Consortium (SWAC) before they could be provided with these documents. The documents are further subject to Port Authority’s Non-Disclosure and Confidentiality Agreement, designating categories of documents as “Confidential Information” or “Confidential Privileged Information.” The drawings in Exhibits B and C were designated by Port Authority as “Confidential” and “Confidential Privileged” respectively. The Port Authority’s Information Security Handbook provides further restrictions on how these

documents can be used and reproduced. As such, Plaintiff is prohibited from filing these exhibits on the public docket, and Port Authority has requested that Plaintiff instead submit to the Court redacted versions of these documents under seal. Accordingly, RSA respectfully requests that the Court grant its motion to file the above-identified documents under seal.



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Dated: January 27, 2020

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*Attorneys for Plaintiff  
RSA Protective Technologies, LLC*

**SO ORDERED:**

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Dated: February 20, 2020



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HON. Stewart D. Aaron  
United States Magistrate Judge